

Privacy Act Statement. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, dissemination report, copy of political propaganda or other document or information filed with the Attorney General under this act is a public record open to public examination, inspection and copying during the posted business hours of the Registration Unit in Washington, D.C. One copy is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of such documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. Finally, the Attorney General transmits an annual report to the Congress on the Administration of the Act which lists the names of all agents and the nature, sources and content of the political propaganda disseminated or distributed by them. This report is available to the public.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .49 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, Registration Unit, Criminal Division, U.S. Department of Justice, Washington, D.C. 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.

*Furnish this exhibit for EACH foreign principal listed in an initial statement  
and for EACH additional foreign principal acquired subsequently.*

1. Name and address of registrant  Burgum & Grimm, Ltd. 106 North Carolina Avenue, S. E., Washington, D. C. 20003	2. Registration No.  4301
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3. Name of foreign principal  Committee for Free Elections & Democracy in Nicaragua	4. Principal address of foreign principal 1390 Brickell Avenue Miami, FL 33131
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5. Indicate whether your foreign principal is one of the following type:

- ☐ Foreign government
- ☐ Foreign political party
- ☐ Foreign or ~~or~~ domestic organization: If either, check one of the following:
- |   |  |
|---|--|
| <input type="checkbox"/> Partnership                            | <input checked="" type="checkbox"/> Committee  |
| <input type="checkbox"/> Corporation                            | <input type="checkbox"/> Voluntary group       |
| <input type="checkbox"/> Association                            | <input type="checkbox"/> Other (specify) _____ |
| <input type="checkbox"/> Individual—State his nationality _____ |  |

6. If the foreign principal is a foreign government, state:

- a) Branch or agency represented by the registrant.
- b) Name and title of official with whom registrant deals.

7. If the foreign principal is a foreign political party, state:

- a) Principal address
- b) Name and title of official with whom registrant deals.
- c) Principal aim

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8. If the foreign principal is not a foreign government or a foreign political party,

a) State the nature of the business or activity of this foreign principal

The Committee for Free Elections & Democracy in Nicaragua is a group of the Nicaraguan Civic Task Force of Miami, Florida whose purpose is to raise funds to finance the installation of the mechanisms necessary to ensure free and fair elections in Nicaragua on February 26th 1990, as well as to assist in the campaign of the Union Nacional Opositora (UNO) and its candidates for President and Vice President, Mrs. Violeta Chamorro and Mr. Virgilio Godoy respectively.

b) Is this foreign principal

Owned by a foreign government, foreign political party, or other foreign principal ..... Yes ☐ No ☒

Directed by a foreign government, foreign political party, or other foreign principal ..... Yes ☐ No ☒

Controlled by a foreign government, foreign political party, or other foreign principal ..... Yes ☐ No ☒

Financed by a foreign government, foreign political party, or other foreign principal ..... Yes ☐ No ☒

Subsidized in whole by a foreign government, foreign political party, or other foreign principal ..... Yes ☐ No ☒

Subsidized in part by a foreign government, foreign political party, or other foreign principal ..... Yes ☐ No ☒

9. Explain fully all items answered "Yes" in Item 8(b). (If additional space is needed, a full insert page may be used.)

10. If the foreign principal is an organization and is not owned or controlled by a foreign government, foreign political party or other foreign principal, state who owns and controls it.

The Committee for Free Elections & Democracy in Nicaragua is sponsored by the Nicaraguan Civic Task Force, a not-for-profit organization incorporated in the State of Florida.

Date of Exhibit A

10/2/89

Name and Title

Rodman D. Grimm, President

Signature

Rodman D. Grimm

**INSTRUCTIONS:** A registrant must furnish as an Exhibit B copies of each written agreement and the terms and conditions of each oral agreement with his foreign principal, including all modifications of such agreements; or, where no contract exists, a full statement of all the circumstances by reason of which the registrant is acting as an agent of a foreign principal. This form shall be filed in triplicate for each foreign principal named in the registration statement and must be signed by or on behalf of the registrant.

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**Public Reporting Burden.** Public reporting burden for this collection of information is estimated to average .33 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, Registration Unit, Criminal Division, U.S. Department of Justice, Washington, D.C. 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.

Name of Registrant

Burgum & Grimm, Ltd.

Name of Foreign Principal

Committee for Free Elections & Democracy in  
Nicaragua

Check Appropriate Boxes:

1. ☒ The agreement between the registrant and the above-named foreign principal is a formal written contract. If this box is checked, attach three copies of the contract to this exhibit.
2. ☐ There is no formal written contract between the registrant and foreign principal. The agreement with the above-named foreign principal has resulted from an exchange of correspondence. If this box is checked, attach three copies of all pertinent correspondence, including a copy of any initial proposal which has been adopted by reference in such correspondence.
3. ☐ The agreement or understanding between the registrant and the foreign principal is the result of neither a formal written contract nor an exchange of correspondence between the parties. If this box is checked, give a complete description below of the terms and conditions of the oral agreement or understanding, its duration, the fees and the expenses, if any, to be received.

4. Describe fully the nature and method of performance of the above-indicated agreement or understanding.

See attached contract which answers this question in detail.

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5. Describe fully the activities the registrant engages in or proposes to engage in on behalf of the above foreign principal.  
See attached contract which answers this question in detail.

6. Will the activities on behalf of the above foreign principal include political activities as defined in Section 1(o) of the Act?<sup>1</sup>  
Yes ☒ No ☐

If yes, describe all such political activities indicating, among other things, the relations, interests or policies to be influenced together with the means to be employed to achieve this purpose.

See attached contract which answers this in detail.

Date of Exhibit B  
10/2/89

Name and Title  
Rodman D. Grimm, President

Signature  
*Rodman D. Grimm*

<sup>1</sup>Political activity as defined in Section 1(o) of the Act means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

**AGREEMENT BETWEEN  
BURGUM & GRIMM, LTD.**

**AND**

**THE COMMITTEE FOR FREE ELECTIONS AND  
DEMOCRACY IN NICARAGUA**

This Agreement, made and entered into and effective as of the date of signature by and between Burgum & Grimm, Ltd., a corporation of the State of Virginia, having offices at 106 North Carolina Avenue, S.E., Washington, D.C. 20003 (hereinafter referred to as B&G)

and

The Committee for Free Elections and Democracy in Nicaragua of the Nicaraguan Civic Task Force, a not-for-profit corporation of the State of Florida, having offices at 1390 Brickell Avenue, Miami, Florida 33131, (hereinafter referred to as the Committee)

WHEREAS, the Committee requires a Washington government relations firm to provide Washington liaison services, working in coordination with The Carmen Group to facilitate The Carmen Group's fundraising programs;

WHEREAS the Committee requires a highly experienced professional staff in an office in Miami, Florida to, among other tasks: provide financial management of funds, maintain accurate financial and other records, file all necessary U.S. Federal and Florida State tax and other documents, and formulate and run a bilingual, continuous and consistent press program, and respond to inquiries from donors, potential donors, banks, press, government officials and other interested parties;

WHEREAS, Burgum & Grimm, Ltd. has the qualifications and expertise to perform these services;

NOW THEREFORE, in consideration of the premises and of the mutual covenants herein contained, it is agreed as follows.

**SCOPE OF WORK**

B&G will undertake the following for the Committee:

**COORDINATION ACTIVITIES**, including but not limited to

- o Coordinating with and assisting The Carmen Group in its fundraising activities, especially in regard to Spanish-speaking potential donors;
- o Coordinating activities of The Carmen Group, Committee members and UNO representatives to ensure that fundraising events are well attended by all the necessary individuals and groups.

**LIAISON ACTIVITIES**, including but not limited to:

- o Initiating and maintaining constant liaison in Washington with U.S. Government officials in the U.S. House of Representatives, Senate, Federal agencies including the Departments of State, Justice and Treasury, the Agency for International Development and the White House to ensure the present Administration's full assistance and cooperation in securing financial and other assistance to guarantee free elections in Nicaragua;
- o Initiating and maintaining constant liaison with former U.S. government officials that may be helpful to furthering the Committee's financial and political goals;
- o Initiating and maintaining contacts with international organizations based in the East Coast such as the Organization of American States, the United Nations, as requested by the Committee

**Agreement between Burgum & Grimm, Ltd.  
and The Committee for Free Elections  
and Democracy in Nicaragua  
Page 2**

- o Scheduling appointments for Committee and UNO members in various U.S. cities with federal and state, past and present, government officials, community and civic leaders and potential and past donors, as identified by Burgum & Grimm, The Carmen Group and members of the Committee.

**PRESS ACTIVITIES, including but not limited to:**

- o Designing and conducting an effective, efficient and continuous bilingual national press program including but not limited to the orchestration of press events, preparation and distribution of press releases in English and Spanish, maintenance of personal contracts with reporters from all important news organizations in major U.S. cities in order to educate U.S. citizens on the importance to the U.S. of this country's and citizens' support to Nicaraguan free elections, the Committee's activities and campaign activities undertaken by the UNO in Nicaragua.

**ADMINISTRATIVE AND FINANCIAL ACTIVITIES, including but not limited to:**

- o Providing professional support to the Committee's Miami office by persons experienced in providing bookkeeping, auditing and other financial management services in connection with fundraising and campaign programs; said financial management responsibilities to include but not be limited to effective and profitable management of funds prior to disbursements; processing of payments to domestic and foreign vendors; maintenance of banking relationships; maintenance of accurate donor lists; maintenance of all of the Committee's books, filing of necessary Federal and state tax and other forms and preparation of bi-weekly financial reports for the Committee and fundraisers;
- o Obtaining bids on behalf of the Committee for articles to be purchased in the U.S. and Central America for the campaign; ensuring that manufacturers meet the Committee's predetermined schedules; completing all necessary documentation for shipment of materials to Nicaragua, as required by U.S. and Nicaraguan governments; arranging for expeditious and safe shipment and delivery of campaign articles to the UNO in Nicaragua;
- o Directing and supervising activities of staff in the Miami office to ensure that the office is run in the most efficient, cost-effective, professional and courteous manner,

**STRATEGY FORMULATION ACTIVITIES**

#### EXPENSES

The Committee will reimburse B&G for all normal and appropriate business expenses, to include:

- Meals and entertainment undertaken on behalf of the Committee or when traveling on behalf of the Committee;
- Travel expenses, outside the Washington DC area when traveling on behalf of the Committee;
- Long distance international telephone communication expenses;
- Federal express, courier and postage charges incurred on behalf of the Committee.

#### CONFIDENTIALITY

The Committee and B&G agree to hold confidential any information received in the course of work under this Agreement.

#### BEST EFFORT

B&G cannot make any guarantee as to the result of any effort undertaken under the terms of this contract; however, it is understood that B&G will always exercise its best efforts on behalf of the Committee.

#### DISPUTES

Both Parties agree that if any claims or disputes arise out of this Agreement, the specific points of disagreement will be resolved in accordance with the then effective rules and at formal proceedings of the Metropolitan Washington Area American Arbitration Association.

#### ETHICS

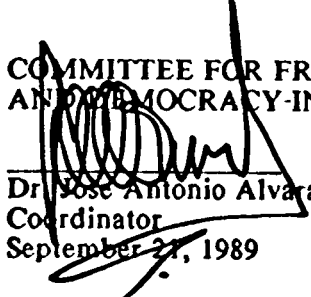
B&G shall conduct itself in the highest ethical matters in all matters or contacts involving the Committee.

#### WRITTEN AGREEMENTS

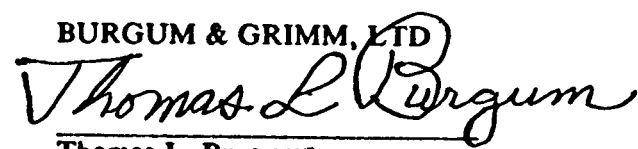
All negotiations, considerations, representations and understanding between the Parties are incorporated and expressly state herein, and may be modified and altered only by agreement in writing between the Parties.

IN WITNESS THEREOF, the Parties hereto execute this Agreement as of the date first written above.

COMMITTEE FOR FREE ELECTIONS  
AND DEMOCRACY IN NICARAGUA

  
Dr. Jose Antonio Alvarado  
Coordinator  
September 21, 1989

BURGUM & GRIMM, LTD

  
Thomas L. Burgum  
Executive Vice President and Secretary  
September 21, 1989